UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: MICHAEL D. NOLAN and : CHAPTER 13

LINDA R. NOLAN

Debtor(s)

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CHARLES J. DEHART, III

STANDING CHAPTER 13 TRUSTEE

Movant

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VS.

:

MICHAEL D. NOLAN and

LINDA R. NOLAN

Respondent(s) : CASE NO. 1-20-bk-00962

TRUSTEE'S OBJECTION TO SECOND AMENDED CHAPTER 13 PLAN

AND NOW, this 16th day of November, 2020, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

- 1. The Trustee avers that debtors' plan is not feasible based upon the following:
 - a. Unfiled 2019 federal income tax return (Claim #2).
 - b. The plan is underfunded relative to claims to be paid.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Charles J. DeHart, III Standing Chapter 13 Trustee 8125 Adams Drive, Suite A Hummelstown, PA 17036 (717) 566-6097

BY: /s/James K. Jones

Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 16th day of November, 2020, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

James Turner, Esquire 915 N. Mountain Road, Suite D Harrisburg, PA 17112

/s/Deborah A. Behney
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee